

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

CIVIL ACTION

Plaintiff,

No. 2:22-cv-547

v.

Judge Horan

MICHAEL RUSSIN, RUSSIN  
FINANCIAL, RUSSIN GROUP, SIMON  
ARIAS, III, ARIAS AGENCIES, S.A.  
HOLDING AMERICAN INCOME LIFE  
INSURANCE COMPANY,

Defendant.

JURY TRIAL DEMANDED

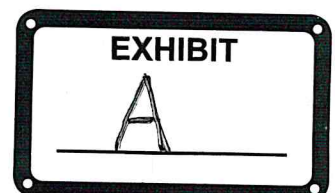
**PLAINTIFF'S INITIAL DISCLOSURES**

Plaintiff Renee Zinsky, through her undersigned counsel, makes her initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedures and the Court's scheduling order.

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

**A. Liability**

- |   |   |
|---|---|
| 1. Renee Zinsky<br>5023 Sutton Place<br>Wexford, PA 15090 | Plaintiff has information concerning the allegations in her complaint.  |
| 2. Malorie Fry<br>5023 Sutton Place<br>Wexford, PA 15090  | Ms. Fry has information concerning the allegations in Plaintiff's complaint.  |
| 3. Michael Russin<br>11 Noble Lane<br>Windham, ME 04062   | Mr. Russin is believed to have information concerning the allegations in Plaintiff's complaint.   |
| 4. Geneva Russin<br>11 Noble Lane<br>Windham, ME 04062    | Mrs. Russin is believed to have information concerning Defendant, Michael Russin's inappropriate behavior toward Plaintiff and other females. |



5. Simon Arias  
103 Indian Meadow Drive  
Mars, PA 16046  
Mr. Arias is believed to have information regarding Defendant Michael Russin's hiring/employment with AIL/Arias Agencies, termination of Mr. Russin, Plaintiff's reports of fraud, sexual harassment and sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
4. Chrissy Vansuch  
14612 Mirabelle Vista Circle  
Tampa, FL 33626  
813-475-4839  
Ms. Vansuch is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
5. Natalie D'Achilles  
150 Lake Drive  
Wexford, PA 15090  
724-612-3361  
Mrs. D'Achilles is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
6. Katie McCabe  
150 Lake Drive  
Wexford, PA 15090  
412-848-6722  
Ms. McCabe is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
7. Steven Greer  
1200 Wooded Acres  
Waco, TX 76710  
Mr. Greer is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.
8. David Zophin  
1200 Wooded Acres  
Waco, TX 76710  
Mr. Zophin is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.
9. Debbie Gamble  
1200 Wooded Acres  
Waco, TX 76710  
Ms. Gamble is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.

10. Soyla Villareal  
1200 Wooded Acres  
Waco, TX 76710  
Ms. Villareal is believed to have information regarding the Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
11. Janet Hendrick  
Phillips Murrah  
710 Rawlins Street, Suite 900  
Dallas, TX 75219  
Ms. Hendrick is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' investigation of Plaintiff's complaints, AIL's termination of Mr. Russin.
12. Logan Blackmore  
700 S Stonebridge Drive  
McKinney, TX 75070  
Ms. Blackmore is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' investigation of Plaintiff's complaints.
13. Jeremiah Russin  
11 Noble Lane  
Windham, ME 04062  
Mr. Russin is believed to have information regarding the employment and termination of Michael Russin, ownership, business, and operations of Russin Financial
14. Chris Gilbert  
Bridgeville, PA  
Mr. Gilbert is believed to have information regarding the employment and termination of Michael Russin, unethical and inappropriate behavior of Mr. Russin, and the business and operations of Russin Financial
15. Brendan Gilbert  
Carnegie, PA  
Mr. Gilbert is believed to have information regarding Mr. Russin's inappropriate behavior, business and operations of Russin Financial
16. Cameron Labrie  
Portland, ME  
Mr. Labrie is believed to have information regarding Mr. Russin's unethical and inappropriate behavior, business and operations of Russin Financial
17. Ray Salmon  
Saegertown, PA  
Mr. Salmon is believed to have information regarding sexual harassment/assault by Mr. Russin, Mr. Russin's inappropriate behavior, business and operations of Russin Financial

18. Travis Vaughn  
Erie, PA  
Mr. Vaughn is believed to have information regarding the employment of Mr. Russin, Mr. Russin's unethical and inappropriate behavior, business and operations of Russin Financial
19. Maria Folino  
1565 Hastings Mill Road  
Pittsburgh, PA 15241  
Ms. Folino is believed to have information regarding Mr. Russin's unethical and inappropriate behavior, business and operations of Russin Financial
20. Joe Lamb  
Wexford, PA  
Mr. Lamb is believed to have information regarding Mr. Russin's unethical and inappropriate behavior, business and operations of Russin Financial
21. Shannon Vaughn  
931 Benton Avenue  
Pittsburgh, PA 15212  
Ms. Vaughn is believed to have information regarding Mr. Russin's inappropriate behavior, business and operations of Russin Financial
22. Charles Ferarri  
North Versailles, PA  
Mr. Ferrari is believed to have information regarding Mr. Russin's unethical and inappropriate behavior including but not limited to recent threats of violence
23. Brian Welsh  
Kennedy, PA  
Mr. Welsh is believed to have information regarding Mr. Russin's inappropriate behavior
24. David Burkes  
New Castle, PA 16101  
Mr. Burkes is believed to have information regarding Mr. Russin's inappropriate and unethical behavior
25. Tyler Szpakowski  
Pittsburgh, PA 15216  
Mr. Szarkowski is believed to have information regarding Mr. Russin's inappropriate and unethical behavior
26. Christina Quillen  
Miami, FL  
Ms. Quillen is believed to have information regarding Mr. Russin's inappropriate and unethical behavior, and Mr. Russin's termination



**INTERROGATORIES**

1. State the full name, age, address, and telephone number of the person answering these interrogatories.

**ANSWER:**

**Renee Zinsky  
5023 Sutton Place  
Wexford PA 15090  
28 yrs old**

2. Identify each and every person that Plaintiff believes has knowledge of any facts on which Plaintiff bases any allegations in the Complaint, stating as to each such person the facts about which he or she purportedly has knowledge.

**ANSWER:**

**See 26 witnesses (many of which are represented by Plaintiff's counsel) identified in Plaintiff's Initial Disclosures. In addition, Plaintiff identifies the following 17 witnesses:**

- 1. Anne Zacharias – knowledge of Defendant Russin's harassment and threats directed to Plaintiff and Plaintiff's place of employment from November 2021 – present; knowledge of Plaintiff's reputation.**
- 2. Dara-Lynn Hockman – knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company. Ms. Hockman is represented by Plaintiff's counsel.**
- 3. Abeni Mayfield – knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Ms. Mayfield is represented by Plaintiff's counsel.**
- 4. Mikelle Mayfield - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Mayfield is represented by Plaintiff's counsel.**
- 5. Melissa Ahrent - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Ms. Ahrent is represented by Plaintiff's counsel.**
- 6. Colin Bannister - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Bannister is represented by Plaintiff's counsel.**
- 7. David Haak - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Haak is represented by Plaintiff's counsel.**
- 8. Julia Gogol - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and**

American Income Life Insurance Company; knowledge of Plaintiff's reputation. Ms. Gogol is represented by Plaintiff's counsel.

9. Meggan Dipietro - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Ms. Dipietro is represented by Plaintiff's counsel.
10. Nick Atallah - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Atallah is represented by Plaintiff's counsel.
11. Emily Fleming - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Ms. Fleming is represented by Plaintiff's counsel.
12. Terrek Ray - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Ray is represented by Plaintiff's counsel.
13. Aaron Oestenriter - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture at Russin Financial, Arias Agencies and American Income Life Insurance Company; knowledge of Plaintiff's reputation. Mr. Oestenriter is represented by Plaintiff's counsel.
14. Michele Crowe - knowledge of Defendant Russin's unethical and inappropriate behavior; knowledge of toxic work culture Arias Agencies and American Income Life Insurance Company. Ms. Crowe is represented by Plaintiff's counsel.
15. Officer Chuberko, Ross Township Police Department – knowledge of Plaintiff's vandalized vehicle.
16. Mark Zinsky – knowledge of Plaintiff's allegations contained in her Complaints and other pleadings; knowledge of Plaintiff's reputation.
17. Eric Fisher, Esq. – knowledge of Plaintiff's allegations contained in her Complaints and other pleadings.

3. Identify each and every individual, other than Plaintiff's attorneys, with whom Plaintiff has spoken regarding any of the allegations in this lawsuit, including communications concerning any individual's actual or potential participation in this lawsuit, and for each such person identified, describe in detail the extent or nature of the conversation and state the date of the conversation, the persons involved in the conversation, and whether Plaintiff has any documents, notes, or other writings referring or relating to the conversation. Produce copies of all such documents with Plaintiff's answers to these Interrogatories.

**ANSWER:**

1. Mallory Fry – See Plaintiff's Answer No. 2.
2. Mark Zinsky – See Plaintiff's Answer No. 2
3. Anne Zacharias – See Plaintiff's Answer No. 2.